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November 12, 2008

Bruce E. Blackmer, FAIA, President
National Architectural Accrediting Board, Inc.
1735 New York Avenue NW
Washington, DC 20006

Dear Bruce and Members of the NAAB Board of Directors:

The ACSA has appreciated our ability to participate in the "design process" for the creation of revised *Conditions for Accreditation*. The six ACSA representatives who attended the Accreditation Review Conference discussed the many issues with the entire ACSA Board of Directors, and we would like to give you our unanimous recommendations for the next steps in this process.

Regarding the overall approach:
We appreciated the commitment for "standards without standardization" that we sensed from participants at the ARC meeting. Avoiding over-prescription will give schools the flexibility to create programs that respond to contemporary practice issues in innovative ways.

The proposed two-part format in the APR is understandable, although we recommend that "Institutional Support" should be Part One; otherwise, the SPC are addressed apart from any institutional context. There is also some concern about how the "perspectives" are embedded in the report, and we encourage you to capture the spirit of the perspectives, without allowing them to seem overly related to each of the collateral organizations.

Regarding faculty development and credentials:
During the ACSA Administrators Conference, over 60 deans and administrators of NAAB-accredited programs expressed strong opposition to quotas for faculty licensure and credentials, and the ACSA board concurs. Instead, the ACSA has concluded that accreditation standards should require appropriately qualified faculty for the courses in which they are teaching. In addition, the ACSA believes that a strong focus on faculty development, not credentials, would have maximum direct impact on improving programs.

ACSA does not support mandatory faculty credentials related to licensure because no evidence demonstrates this would improve student outcomes. Such quotas will inevitably constrain goals to increase the interdisciplinary experiences of the students, related to the increasing interdisciplinary nature of integrated practice. Furthermore, most universities have stringent faculty requirements related to qualification and education.

Regarding IDP:
The ACSA strongly supports the language presented during the ARC in the "Fusion II" draft. Any type of mandatory IDP, even if free, would be a hardship for many schools and students.

Regarding the "clustering" of SPC:
After much discussion in Tucson and with the ACSA board, we conclude that the Student Performance Criteria remain most effective as a simple list, rather than be grouped in a fixed "cluster" approach. Because the clustering exercise at the ARC produced such diverse results, we have concluded that individual schools preparing their APR, rather than NAAB, are best suited to "cluster" the SPC, should they choose. We believe it best that schools have the opportunity to outline their curricular goals, philosophies, and structure, and therefore, any clustering of SPCs should be optional rather than mandatory.

Regarding the SPC in general:
We strongly advocate that the wording in SPC should include expressions like "such as" rather than "including" when referring to numerous elements within a criterion. This will prevent prescription, will give guidance to schools and teams, and will allow teams to make a holistic judgment for each SPC. This will also minimize inconsistencies in team judgments.

We do not endorse adding measures of outcomes to the SPC, but rather encourage the continued format of a narrative description for each SPC.

Regarding an Education Analysis:
We strongly support developing an Education Analysis, along the lines of NCARB's Practice Analysis, with participation by the collaterals. However, we believe that delaying changes to the *Conditions for Accreditation* until the completion of such a study would not be in the best interest of any of the collaterals or the schools. As we move forward, we advocate a process that begins in 2010, with ACSA leading the development of this important cross-collateral effort. Ideally, a nonbinding Education Analysis (as outlined in the Conceptual Plan of October 2008) will better inform the next cycles of accreditation and internship requirements.

Regarding specific SPCs:
We encourage NAAB to further reduce and refine the SPCs, in the spirit of the discussions in Tucson. We specifically oppose the subdivision of Graphic Skills into three separate SPCs and the creation of separate SPC in Building Design, Urban Design and Interior Design.

The entire Accreditation Review Process has been an intense evaluation of architectural education, with broad participation. We appreciate the many cycles for input and comment throughout the process. As was noted at the conclusion of the Tucson conference, the broad input into this cycle of accreditation review creates an important moment in the long history of architectural education.

With best wishes in your tasks ahead,

Marleen Kay Davis, FAIA
President

cc: Andrea S. Rutledge, CAE, NAAB executive director; Gordon E. Mills, FAIA, NCARB president; Marshall Purnell, FAIA, AIA president; JW Blanchard, Assoc. AIA, AIAS president